

AO 106 (Rev. 04/10) Application for a Search Warrant

UNITED STATES DISTRICT COURT

for the
Southern District of OhioFILED
RICHARD W. NAGEL
CLERK OF COURT

4/16/20

In the Matter of the Search of
*(Briefly describe the property to be searched
 or identify the person by name and address)*
 Priority Mail Express Tracking Number EJ213216690US
 postmarked April 13, 2020

Case No.
 3:20-mj-182
 Magistrate Judge Michael J. Newman

U.S. DISTRICT COURT
 SOUTHERN DIST. OHIO
 WEST. DIV. DAYTON

APPLICATION FOR A SEARCH WARRANT BY TELEPHONE OR OTHER RELIABLE
ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Priority Mail Express Tracking No. EJ213216690US postmarked April 13, 2020, addressed to Ray Harris, 441 W 112th St, Los Angeles, CA 90061, with return address of C. King, 3930 Casper Ave, Dayton, OH 45416

located in the Southern District of Ohio, there is now concealed *(identify the person or describe the property to be seized)*:

Materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

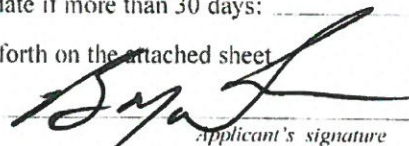
The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. 841(a)(1)	Distribution and possession with intent to distribute a controlled substance
21 U.S.C. 846	Conspiracy to distribute/possess with intent to distribute a controlled substance
21 U.S.C. 843(b)	Use of a communication facility to commit a felony

The application is based on these facts:

SEE ATTACHED AFFIDAVIT

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet



 Applicant's signature

Brad M Dorman, U.S. Postal Inspector
 Printed name and title

Sworn to before me and signed in my presence via facetime.

Date: 04/15/2020

City and state: Dayton, Ohio


 Michael J. Newman
 United States Magistrate Judge

Hon. Michael J. Newman, United States Magistrate Judge
 Printed name and title

4:10 PM, Apr 15, 2020

Via electronic means.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
DAYTON, OHIO

STATE OF OHIO)
) SS
COUNTY OF MONTGOMERY)

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, BRAD M. DORMAN, HAVING BEEN DULY SWORN, DEPOSE AND STATE: I am a United States Postal Inspector and have been since August 2017. I am presently assigned to the Cincinnati Field Office of the United States Postal Inspection Service, Pittsburgh Division, with investigative responsibility for southeast Indiana and southern Ohio. Part of my responsibility involves investigating the use of the United States Mail in the transportation of narcotics and dangerous controlled substances (hereinafter, "Drugs") and financial proceeds from, or instrumentalities used in, the sale of such narcotics and controlled substances (hereinafter, "Proceeds").

Based on my training and experience as a United States Postal Inspector, I have become aware that drug traffickers frequently use United States Priority Mail Express (overnight) or Priority Mail (2-3-day) to transport Drugs and/or Proceeds. Additionally, as a result of prior investigations and successful controlled-substance prosecutions involving the use of the United States Mail, I have learned of certain characteristics and/or circumstances indicating that a parcel may contain Drugs and/or Proceeds. These circumstances include, but are not necessarily limited to, the following: the mailer uses different post offices on the same day to send parcels, the return address is false or non-existent, the addressee is not known to receive mail at the listed delivery address, the parcel is heavily taped, the parcel is mailed from a known drug source location, the labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors are emanating from the parcel, and the listed address is located in an area of known or suspected drug activity.

On April 13, 2020, I intercepted a Parcel (hereinafter, the "Parcel") at the Dayton Processing and Distribution Plant in Dayton, OH. The Parcel, is a white USPS Priority Mail Express Envelope, bearing tracking number EJ213216690US, weighing 1 pound 1 ounce, postmarked April 13, 2020, with the following address information:

Sender: C. King
3930 Casper Ave
Dayton, OH 45416

Addressee: Ray Harris
441 W 112th St
Los Angeles, CA 90061

Through training and experience, I am aware that the State of California is a known drug source location. I also know, through training and experience, that individuals sometimes use the mail to send Proceeds to drug source locations.

I did a check in CLEAR of the addressee's information on the Parcel of 441 W 112th St, Los Angeles, CA 90061. CLEAR is a law enforcement database that is used as a tool for investigators to identify person/business and address information. According to CLEAR, there is no "Ray Harris" associated with 441 W 112th St, Los Angeles, CA 90061.

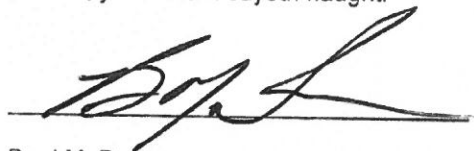
I also did a check in CLEAR of the sender's information on the Parcel of C. King, 3930 Casper Ave, Dayton, OH 45416. According to CLEAR, there is a "Chauncey King" associated with 3930 Casper Ave, Dayton, OH 45416. Through training and experience, I am aware that the sender's failure to provide their correct/full name or address on a Parcel can be an indicator that the Parcel contains contraband, including Drugs and/or Proceeds.

Later on April 15, 2020, at my request, Dayton Police Officer Jeremy Stewart conducted a narcotics-detection canine check of the Parcel. I was present for the check. The Parcel was placed in a controlled area and presented to narcotics-detection canine, "Weston." As set forth in the attached affidavit of Officer Stewart, "Weston" alerted positively to the presence or odor of a narcotic or other controlled substance within or upon the Parcel.

Based on my training and experience as a United States Postal Inspector, the foregoing circumstances, including, (i) the Parcel being sent to a known drug source location, (ii) the recipient's name not being associated with the recipient's address, and (iii) the positive alert of the narcotics-detection canine, are indicative of Proceeds in the Parcel.


A search warrant to open the Parcel is requested.

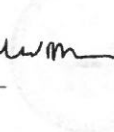
Further, your affiant sayeth naught.

A handwritten signature in black ink, appearing to read "Brad M. Dorman", written over a horizontal line.

Brad M. Dorman
U.S. Postal Inspector

Subscribed and sworn to and before me this 15th day of April, 2020.

— 
Hon. Michael J. Newman
Unit: Michael J. Newman
United States Magistrate Judge

A faint, circular official seal is visible in the background, partially obscured by the signature and text.

Via electronic means.



UNITED STATES POSTAL INSPECTION SERVICE

PITTSBURGH DIVISION

OFFICER AFFIDAVIT

I, Officer JEREMY STEWART, am and have been employed by the DAYTON POLICE DEPARMTNET since 2014. Among other duties, I am currently the assigned handler of narcotics detection canine "WESTON" which is trained and certified in the detection of the presence or odor of narcotics described as follows:

Marijuana, Cocaine, Methamphetamine, and Heroin

On 04/15/2020, at the request of Postal Inspector DORMAN, I responded to the DAYTON P&DC, where "WESTON" did alert to and indicate upon: [describe item]

USPS Priority Express Mail Tracking # EJ318422815US

TO: RAY HARRIS	FROM: C. KING
441 W 112 TH ST	3930 CASPER AVE
LOS ANGELES, CA 90061	DAYTON, OH 45416

Which, based upon my training and experience and that of "WESTON", indicates there is contained within or upon the above described item, the presence or odor of a narcotic or other controlled substance.

[Signature] / 28943 / 4-15-20
(Signature, Badge #, and Date)

[Signature] 4/15/2020
(Witness/Date)